

## **EXHIBIT 4**

15:02:50 Q. Other than that?

15:02:53 A. He'd probably be all right.

15:03:02 Q. Okay. Now, showing you Exhibit 8,  
4 this is a document entitled certification  
5 pursuant to local rule 26.2 B and is that your  
6 signature at the bottom of the page there, ma'am?

15:03:16 A. Yes, sir.

15:03:19 Q. When did you sign this?

15:03:22 A. I'm not sure when it was.

15:03:25 Q. To your best recollection, when did  
11 you sign this?

15:03:33 A. I don't know.

15:03:35 Q. Was it in the last week or two or  
14 could it have been a year or two ago?

15:03:41 A. It's been longer than that.

15:03:46 Q. Okay. Do you know whether it was  
17 sometime this year, 2007?

15:04:00 A. It wasn't this year.

15:04:04 Q. Was it in -- was it in 2006?

15:04:07 A. I don't remember when it was done.

15:04:10 Q. Could it have been 2005 or 2004?

15:04:11 A. Possibly.

15:04:18 Q. And you, you say there that you  
24 have discussed the scope of discovery in this  
25 action with your counsel. Do you see that?

1 First sentence?

15:04:26 A. Uh-huh.

15:04:28 Q. You have to use words.

15:04:29 A. Yes.

15:04:30 Q. Thank you.

15:04:36 And do you know what discovery is?

15:04:48 A. I don't know how to put that into

8 words, but I'm sure I do know what that means.

15:04:55 Q. What to you is discovery in the

10 context of a lawsuit like this?

15:05:11 A. That they have found things that

12 were wrong.

15:05:22 Q. Does it mean anything else?

15:05:28 A. I don't know.

15:05:32 Q. And then in the, in the next

16 sentence, you say that you consent to any effort

17 to seek discovery events that exceed the

18 presumptive limits set forth in the Federal and

19 local rules of the United States district court

20 for the district of Massachusetts. Do you see

21 that?

15:05:54 A. Yes.

15:05:59 Q. And what, what does that mean, what

24 are discovery events?

15:06:03 A. I'm not sure.

15:06:08 Q. Well, is it your custom and  
2 practice to sign things when you don't know what  
3 they mean?

15:06:14 A. Well I know why I signed those.

15:06:18 Q. Why did you sign them?

15:06:28 A. Because we were not earning as much  
7 as some of the others were on their stock.

15:06:45 Q. Any other reason?

15:06:45 A. It was wrong.

15:06:48 Q. So you signed this document,  
11 Exhibit 8, for the same reason that you brought  
12 the lawsuit; is that right?

15:06:58 A. For the same reason that we brought  
14 the lawsuit?

15:07:00 Q. Isn't the reason that you brought  
16 the lawsuit that you say people were getting a  
17 better deal from Putnam than you were?

15:07:07 A. That's right.

15:07:09 Q. And isn't that why you just told me  
20 you signed this document, Exhibit 8?

15:07:11 A. Yes.

15:07:18 Q. Can you identify any depositions  
23 that your attorneys have taken in this case?

15:07:23 A. No.

15:07:24 Q. Do you know how many depositions

1       they've taken?

15:07:27               A.     No.

15:07:28               Q.     Do you know how many they want to

4       take?

15:07:29               A.     No.

15:07:30               Q.     Do you know why they're asking

7       permission to take additional depositions if they

8       are, in fact, asking that?

15:07:36               A.     No.

15:07:36               Q.     Do you know whether they are asking

11      for permission to take additional depositions?

15:07:40               A.     No.

15:07:42               Q.     Do you know when fact discovery

14      closes in this case?

15:07:43               A.     No.

15:07:45               Q.     Do you know when expert discovery

17      begins in this case?

15:07:46               A.     No.

15:07:48               Q.     Do you know when expert discovery

20      closes in this case?

15:07:49               A.     No.

15:07:51               Q.     Do you know of any experts that

23      your attorney has retained for you in this

24      case?

15:07:56               A.     No.

15:07:58 Q. Do you know whether your attorneys  
2 have retained any experts in this case?

15:08:15 A. What do.

15:08:16 Q. Do you know if your?

15:08:17 A. I don't know. I don't know.

15:08:20 Q. Okay. If, if the case goes to  
7 trial, who who's going to testify for your side?

15:08:30 A. I don't know.

15:08:30 Q. Do you know of anybody who's going  
10 to testify for your side?

15:08:33 A. I don't know.

15:08:34 Q. Do you know if you're going to  
13 testify for your side?

15:08:36 A. I don't know.

15:08:37 Q. Do you know if your husband's going  
16 to testify for your side?

15:08:42 A. Don't know.

15:08:46 Q. Have you read the complaint that's  
19 been filed for you in Federal district court of  
20 Massachusetts?

15:08:57 A. .

15:08:59 Q. I'm not asking with reference to a  
23 particular document. I'm asking if you've read  
24 the complaint that's been filed for you in  
25 Federal district court of Massachusetts?

15:09:09 A. I don't remember.

15:09:10 Q. Do you know who filed the complaint  
3 for you in Federal district court in  
4 Massachusetts?

15:09:19 A. I don't remember.

15:09:21 Q. Do you know if a complaint had been  
7 filed for you in the Federal district court of  
8 Massachusetts?

15:09:24 A. I don't know.

15:09:25 Has been.

15:09:26 .

15:09:28 Q. Do you know what judge is presiding  
13 over the case that brings us here for you to give  
14 testimony today?

15:09:33 A. No.

15:09:39 Q. Have you ever heard of the Vanguard  
17 funds?

15:09:40 A. Yes.

15:09:42 Q. Do you know who a no load mutual  
20 fund is?

15:09:44 A. A what?

15:09:45 Q. A no load mutual fund?

15:09:46 A. No.

15:09:48 Q. Do you know what a load style  
25 mutual fund is?